

Juan Chavez, OSB #136428
Hannah Bland, OSB #252404
Oregon Justice Resource Center
PO Box 5248
Portland, OR 97208
Tel: 503-944-2270

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PHILLIP SITBON,

Case No. 3:22-cv-01148-SI

Plaintiff,

v.

CITY OF PORTLAND, PORTLAND POLICE TIME
BUREAU OFFICER CRAIG LEHMAN, and
JOHN DOES 1-10,

UNOPPOSED MOTION FOR EXTENSION OF

Defendants.

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Hannah Bland, counsel for Plaintiff Phillip Sitbon, hereby certifies that she conferred with Naomi Sheffield, counsel for the Defendant City of Portland, and with Karen O'Kasey, counsel for Defendant Craig Lehman, on July 18, 2025, and neither Defendant opposed this motion.

RELIEF REQUESTED

Plaintiff requests an additional 30 days to file his Notice of Appeal. The requested deadline would be August 22, 2025.

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ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon a showing of “good cause.” Fed. R. Civ. P. 16(b)(4). Here, there is good cause for an extension of the Notice of Appeal deadline by 30 days. Plaintiff needs additional time to find appellate counsel and assess appealability of the case. This motion is not made for purposes of delay.

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the new deadline of August 22, 2025 be set.

DATED: July 21, 2025.

/s/ Hannah Bland
Hannah Bland, OSB No. 252404
Oregon Justice Resource Center
PO Box 5248
Portland, OR 97208

Of Attorneys for Plaintiff